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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

NATIONAL STEEL CAR LIMITED,

Plaintiff,

v.

GREENBRIER-CONCARRIL LLC,
GREENBRIER LEASING COMPANY,
LLC, and GREENBRIER-GIMSA, LLC

Defendants.

Case No.: 3:20-cv-01275-YY

JOINT STIPULATION AND MOTION TO
AMEND SCHEDULING ORDER

Plaintiff National Steel Car Limited (“NSC”) and Defendants Greenbrier-Concarril LLC, Greenbrier Leasing Company, LLC, and Greenbrier-Gimsa, LLC (collectively “Greenbrier”), hereby stipulate and jointly move to amend certain of the deadlines set forth in the Court’s September 24, 2020 Minute Entry (ECF No. 89), as amended by the Court’s April 9, 2021, June 1, 2021, June 23, 2021, July 23, 2021, August 6, 2021, August 23, 2021, September 22, 2021, and October 26, 2021 Minute Entries (ECF Nos. 115, 121, 123, 133, 138, 141, 147 & 149) and the Court’s December 8, 2021 Order (ECF No. 155). Due to scheduling conflicts, the parties are unable to schedule the depositions of Messrs. Nicholson and De Luca prior to the current close of fact discovery on April 22, 2022. To allow the parties to complete these depositions and have reasonable time after those depositions to complete expert reports, the parties stipulate and jointly request that the Court enter the following changes to the case schedule:

Event	Current Deadline	Requested New Deadline
Close of Fact Discovery except for completing depositions of Messrs. Nicholson and De Luca	April 22, 2022	No Change
Complete depositions of Messrs. Nicholson and De Luca	April 22, 2022	May 13, 2022
Opening Expert Reports	May 27, 2022	June 17, 2022
Rebuttal Expert Reports	June 24, 2022	July 15, 2022
Expert Discovery	July 29, 2022	August 19, 2022
Meet and Confer to Narrow Claims and Prior Art	August 5, 2022	August 26, 2022
File Report Regarding Results of Meet and Confer	August 12, 2022	September 2, 2022
Dispositive Motions and Daubert	August 26, 2022	September 16, 2022

DATED: April 1, 2022

Respectfully submitted,

/s/ C. Marie Eckert

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